

# WILKERSON ♦ BRYAN

WILKERSON & BRYAN, P.C.  
ATTORNEYS & COUNSELORS

405 SOUTH HULL STREET  
MONTGOMERY, ALABAMA 36104  
TEL. 334.265.1500

MAILING ADDRESS  
POST OFFICE BOX 830  
36101-0830  
FAX 334.265.0319

DANA H. BILLINGSLEY

[dana@wilkersonbryan.com](mailto:dana@wilkersonbryan.com)

February 25, 2011

## Via Electronic Comment Filing System

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Suite TW-A325  
Washington, DC 20554

**Re: Millry Communication, Inc. d/b/a Millry Long Distance's Annual 47 C.F.R. § 64.2009(e) Customer Proprietary Network Information (CPNI) Compliance Certification  
EB Docket No. 06-36**

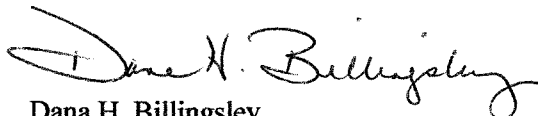
Dear Ms. Dortch:

On behalf of Millry Communication, Inc. d/b/a Millry Long Distance ("Millry Communication"), please find attached the annual CPNI Compliance Certification ("Certification") for Millry Communication for the year 2010 in EB Docket No. 06-36, which has been filed electronically via the Federal Communication Commission's ("Commission") Electronic Comment Filing System on this date. Simultaneously, Millry Communication has also provided one (1) copy of the Certification to Best Copy and Printing, Inc., via electronic mail at [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM), as required under the Commission's Public Notice, DA 11-159 (released January 28, 2011).

Please contact me if you have any questions regarding this matter.

Very truly yours,

WILKERSON & BRYAN, P.C.



Dana H. Billingsley  
*Attorney for Millry Communication, Inc. d/b/a Millry Long Distance*

Wilkerson & Bryan, P.C.  
405 South Hull Street  
Montgomery, Alabama 36104  
Telephone: (334) 265-1500  
Facsimile: (334) 265-0319  
Email: [dana@wilkersonbryan.com](mailto:dana@wilkersonbryan.com)

Enclosure

cc: Bobby Williams  
Best Copy and Printing, Inc.



**Millry Communication, Inc.**

P.O. Box 45  
30433 Highway 17  
Millry, Alabama 36558  
(251) 846-2911

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2010

Date filed: February 24, 2011

Name of company covered by this certification: Millry Communication, Inc. d/b/a Millry Long Distance

Form 499 Filer ID: 819156

Name of signatory: Bobby Williams

Title of signatory: Vice President

In response to the Federal Communications Commission's ("Commission") Public Notice, DA 11-159 (released January 28, 2011), Millry Communication, Inc. d/b/a Millry Long Distance states as follows:

I, Bobby Williams, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's Customer Proprietary Network Information ("CPNI") rules, as set forth in 47 C.F.R. § 64.2001, *et seq.*

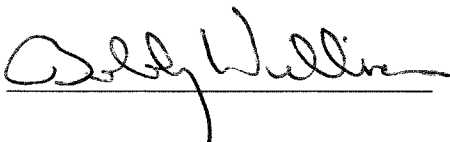
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001, *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI, including unauthorized access to or disclosure of CPNI.

The company represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed



**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

**ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT  
OF  
MILLRY COMMUNICATION, INC. D/B/A MILLRY LONG DISTANCE**

**EB Docket No. 06-36**

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of Millry Communication, Inc. d/b/a Millry Long Distance (hereinafter "Millry Communication") files the following statement of compliance with the requirements set forth in 47 C.F.R. § 64.2001, *et seq.* on behalf of Millry Communication:

1. I have personal knowledge that Millry Communication has implemented a system by which the status of a customer's Customer Proprietary Network Information ("CPNI") approval can be clearly established prior to the use of CPNI.
2. I have personal knowledge that Millry Communication obtains written approval for the use of its customers' CPNI and that Millry Communication has notified its customers of their right to restrict Millry Communication's use of, disclosure of and access to their CPNI prior to obtaining such written approval.
3. I have personal knowledge that Millry Communication has designated a CPNI Compliance Officer, who is responsible for supervising the use, disclosure, distribution or access to its customers' CPNI, that Millry Communication has trained its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. § 64.2001, *et seq.*, and that Millry Communication has an express disciplinary process in place to deal with breaches of CPNI.
4. I have personal knowledge that Millry Communication implemented procedures to safeguard the disclosure of its customers' CPNI, including a customer password and backup authentication system, notification of customer account changes and notification of security breaches of customer CPNI to law enforcement agencies.
5. I have personal knowledge that Millry Communication maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI and further maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to customer CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what

products and services were offered as part of the campaign. Millry Communication retains all such records for a minimum period of one (1) year.

6. I have personal knowledge that Millry Communication has established a supervisory review process regarding Millry Communication's compliance with outbound marketing situations and that Millry Communication maintains records of such compliance for a minimum period of one (1) year. Millry Communication's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

7. I have personal knowledge that Millry Communication has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

On behalf of Millry Communication, I represent and warrant that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject Millry Communication to enforcement action.

Executed on this 24<sup>th</sup> day of February, 2011.

MILLRY COMMUNICATION, INC. D/B/A  
MILLRY LONG DISTANCE

By: Bobby Williams

Printed: Bobby Williams

As Its: Vice President